

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.M. & I.B.,

Plaintiffs,

v.

RADHESVAR, LLC, d/b/a
MOTEL 6,

Defendant.

CIVIL ACTION FILE

NO. 1:24-cv-4039-TWT

NOTICE OF VIDEOTAPED DEPOSITION

TO: Plaintiff I.B.

**C/o Patrick J. McDonough, Esq.
Andersen Tate & Carr, P.C.
One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097**

YOU ARE HEREBY NOTIFIED, pursuant to Federal Rule of Civil Procedure 30, counsel for Defendant will proceed to take a videotaped deposition upon oral examination of **Plaintiff I.B.** on **Thursday, August 28, 2025** commencing at **10:00 a.m.** The deposition will take place at the offices of **Andersen Tate & Carr, P.C., One Sugarloaf Centre, 1960 Satellite Boulevard, Suite 4000, Duluth, Georgia 30097**, before an officer duly authorized by law to administer oaths. This deposition will be taken for the purposes of discovery, cross-examination, preservation of evidence, use at trial, and all other purposes

allowed by law. The deposition will be taken by stenographic means before a certified court reporter and will also be videotaped and it will continue from day to day until examination is complete.

This 25th day of August, 2025.

SWIFT, CURRIE, MCGHEE & HIERS, LLP

By: /s/Tracy A. Gilmore

KORI E. WAGNER

Georgia State Bar No. 155438

MARISSA H. MERRILL

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TRACY A. GILMORE

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **NOTICE OF VIDEOTAPED DEPOSITION (PLAINTIFF I.B.)** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record.

This 25th day of August, 2025.

SWIFT, CURRIE, McGHEE & HIERS

By: /s/ Tracy A. Gilmore

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LOCAL RULE 5.1C CERTIFICATION

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1C.

Respectfully submitted this 25th day of August, 2025.

SWIFT, CURRIE, McGHEE & HIERS

By: /s/ Tracy A. Gilmore
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